

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JOHN L. BULLOCK,)	
)	
Plaintiff,)	
)	No. _____
v.)	
)	
WORLD SAVINGS BANK, FSB,)	
WACHOVIA MORTGAGE, MARY C. REEDER,)	
THE CITY OF MEMPHIS, PAMELA POPE)	
JOHNSON, MELISSA PALO,)	
)	
Defendants.)	

NOTICE OF REMOVAL

Come now Defendants World Savings Bank, FSB, Wachovia Mortgage, and Mary C. Reeder (collectively, “Defendants”) pursuant to 28 U.S.C. §§ 1441 and 1446, and file this Notice of Removal of this action from the Chancery Court of Shelby County, Tennessee for the Thirtieth Judicial District at Memphis and respectfully state as follows:

1. On May 19, 2010, Plaintiff John L. Bullock (“Plaintiff”) filed a “Petition for Action to Quiet Title” (“Complaint”) in the Chancery Court of Shelby County, Tennessee for the Thirtieth Judicial District at Memphis (“State Court”), styled *John L. Bullock, v. Worlds Savings Bank, FSB, Wachovia Mortgage, Senior Vice President Mary C. Reeder, The City of Memphis, Pamela Pope Johnson, and Melissa Palo*, Case No. CH-10-0916-1 (“State Court Action”). The State Court Action is still pending in the State Court.

2. On or around May 26, 2010, Defendants were served with a copy of the Complaint in the State Court Action. Pursuant to 28 U.S.C. § 1446(a), a copy of all process,

pleadings and orders served upon Defendants in the State Court Action to date are attached hereto as Exhibit A.

3. The State Court Action is a civil action over which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1331 because Plaintiff has asserted causes of action based on 15 U.S.C. § 1692, 18 U.S.C. § 1344, and 18 U.S.C. §§ 1961-62. The State Court Action is therefore removable under 28 U.S.C. § 1441.

4. To date, Defendants have not made any appearance in the State Court Action.

5. Pursuant to 28 U.S.C. § 1446(b), Defendants have filed this Notice prior to the expiration of thirty (30) days following their receipt of a copy of the Complaint.

6. Pursuant to 28 U.S.C. § 1446(d), Defendants will give written notice to Plaintiff and will file a Notice of Filing of Notice of Removal, a copy of which is attached hereto as Exhibit B, with the Clerk of the Circuit Court for the State of Tennessee, Thirtieth Judicial District, Shelby County.

7. Because this action was pending in the Chancery Court of Shelby County, Tennessee for the Thirtieth Judicial District at Memphis, removal to the United States District Court for the Western District of Tennessee is proper under 28 U.S.C. § 1441(a).

8. All of the Defendants who have been served with process in the State Court Action have consented to the removal of the State Court Action to this Court.

WHEREFORE, Defendants World Savings Bank, FSB, Wachovia Mortgage, and Mary C. Reeder pray that the State Court Action now pending against them in the Chancery Court of Shelby County, Tennessee for Thirtieth Judicial District at Memphis be removed to this Court.

Respectfully submitted,

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.

s/ Robert F. Tom

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*Counsel for World Savings Bank, FSB,
Wachovia Mortgage, and Mary C. Reeder*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 24th day of June, 2010, a true and exact copy of the foregoing Notice of Filing of Notice of Removal has been served upon the following counsel for the parties in interest herein by first-class U.S. mail, postage pre-paid:

John L. Bullock
3336 Durford Wood Cove
Memphis, Tennessee 38128

Zayid Saleem, Esq.
125 N. Main St., Room 336,
Memphis, Tennessee 38103

s/ Robert F. Tom